

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 333

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On December 30, 2022, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Debtors’ First Omnibus Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts Effective as of the Rejection Date* [D.I. 333] (the “Motion”).

2. On January 11, 2023, the Court entered the *Order Approving Stipulation Between the Debtors and Miami-Dade County* [D.I. 470] (the “Miami-Dade County Order”) and the *Order Approving Stipulation for Resolution of Riot Games’ Motion to Compel and Debtors’ Motion to Reject* [D.I. 480] (the “Riot Games Order”), resolving the Motion with respect to rejection of Debtor West Realm Shires Inc.’s executory contracts with Miami-Dade County and North America League of Legends Championship Series, LLC.

3. On January 25, 2023, the Court entered the *Order Approving Stipulation Between the Debtors and Mercedes-Benz Grand Prix Limited* [D.I. 568] (the “MBGPL Order”) and

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

together with the Miami-Dade County Order and the Riot Games Order, the “Stipulation Orders”), resolving the Motion with respect to rejection of the Debtor Blockfolio, Inc.’s lease with Mercedes-Benz Grand Prix Limited.

4. As of the date hereof, no formal objection or other responses to the Motion have been filed or served on the Debtors. The Debtors have revised the proposed form of order (the “Revised Order”) to remove those leases that have been resolved by the Stipulation Orders, a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed order attached to the Motion is attached hereto as **Exhibit B**.

5. The Revised Order has been circulated to the Office of the United States Trustee and the Official Committee of Unsecured Creditors appointed in the above-captioned cases (collectively, the “Parties”). The Parties have advised that they do not object to entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

6. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: January 25, 2023
Wilmington, Delaware

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/s/ Kimberly A. Brown

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